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Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT
Box”), a Wyoming corporation; JASON R.
ANDERSON, an individual; JACOB S.
ANDERSON, an individual; SCHAD E.
BRANNON, an individual; ROYDON B.
NELSON, an individual; JAMES E.

**DEFENDANTS JASON R. ANDERSON,
JACOB S. ANDERSON, SCHAD E.
BRANNON, AND ROYDON B. NELSON
AND RELIEF DEFENDANTS BUSINESS
FUNDING SOLUTION, LLC, BLOX
LENDING, LLC, THE GOLD
COLLECTIVE, LLC, AND UIU
HOLDINGS, LLC’S MOTION TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b) and DUCivR 7-1(a)(2)(A), Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective, LLC, and UIU Holdings, LLC, by and through undersigned counsel, hereby move the Court to extend the time for these Defendants and Relief Defendants to respond to plaintiff Securities and Exchange Commission's Complaint in this matter until September 22, 2023.

There is good cause for this motion and the requested extension because this case is complex and answering or otherwise responding to the complaint requires additional time. In addition, the above Defendants do not have access to many of the relevant documents and materials in this case and were delayed in hiring counsel in this matter due to the asset freeze ordered herein. As a result, undersigned counsel requires additional time to determine what legal filings are appropriate and to prepare same.

In addition, other defendants in this matter have received similar extensions to the one requested in this motion. Specifically, Defendant Brandin Stangis has received an extension to answer or otherwise respond until September 22, 2023 [Dkt 103] and Defendant Matthew

Fritzsche received an extension to answer or otherwise respond until September 15, 2023. [Dkt 107]. Granting this motion is justified and will not delay the adjudication of this matter.

Counsel for the above Defendants and Relief Defendants attempted to obtain the consent of Plaintiff Securities and Exchange Commission to the relief requested herein but did not receive a response prior to the filing of this motion.

A proposed Order granting the motion has been submitted herewith.

Dated this 24th day of August, 2023.

KUNZLER BEAN & ADAMSON, PC

/s/ Matthew R. Lewis

Matthew R. Lewis

Taylor J. Smith

Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC